

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA

STATE OF MISSOURI, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
EDUCATION, *et al.*,

Defendants.

Case No. 2:24-cv-00103-JRH-BWC

Exhibit 2

Stop-Work Orders

From: [Jackson-Harris, Tricia](#)
To: ["Maximus Next Gen BPO Contracts Team"; "Maximus Next Gen BPO Leadership Team"](#)
Cc: [Lowe, Eddie](#); [Hawkins Panyard, Gabrielle](#); [Patillo, Aquita](#); [Booker, Anthony](#); [Samuels, Shaun](#); [Lohrenz, Mark](#); [Lewis, Crystal](#); [Folley, Victoria](#); [Johnson, Regena](#); [Harris Jones, Christina](#); [Cruz, Bruce J](#); [Odom, Christian](#)
Subject: Modification P00009_91003123F0310 | Stop Work Order - SDR | BPO-MAX
Attachments: [91003123F0310 P00009_SF30_09052024_Signed.pdf](#)

Good evening,

The purpose of the attached modification is to issue a Stop Work Order in accordance with BPO IDIQ Contract clause 52.242-15 Stop Work Order (AUG 1989) for Change Request (CR) 7109 – BPO Support of Student Debt Relief (SDR). All FSA staff and vendors have been directed to cease work related to SDR effective immediately. Please see the modification for details. Further guidance regarding FSA’s course of action will be provided as we receive updates.

Contractor confirmation of receipt and acknowledgement by email is requested.

Sincerely,

Tricia Jackson-Harris
Executive Business Advisor/Contracting Officer
Federal Student Aid – Acquisitions Directorate
U.S. Department of Education
(202) 377-3978 – Desk
(202) 744-4979 – Cell
Tricia.Jackson-Harris@ed.gov

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From: [Jackson-Harris, Tricia](#)
To: "BPO Edfinancial"
Cc: [Lowe, Eddie](#); [Hawkins Panyard, Gabrielle](#); [Patillo, Aquita](#); [Booker, Anthony](#); [Samuels, Shaun](#); [Lohrenz, Mark](#); [Lewis, Crystal](#); [Folley, Victoria](#); [Johnson, Regena](#); [Harris Jones, Christina](#); [Cruz, Bruce J](#); [Odom, Christian](#)
Subject: Modification P00010_91003123F0308 | Stop Work Order - SDR | BPO-EFS
Attachments: [91003123F0308 P00010_SF30_09052024_Signed.pdf](#)

Good evening,

The purpose of the attached modification is to issue a Stop Work Order in accordance with BPO IDIQ Contract clause 52.242-15 Stop Work Order (AUG 1989) for Change Request (CR) 7109 – BPO Support of Student Debt Relief (SDR). All FSA staff and vendors have been directed to cease work related to SDR effective immediately. Please see the modification for details. Further guidance regarding FSA’s course of action will be provided as we receive updates.

Contractor confirmation of receipt and acknowledgement by email is requested.

Sincerely,

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Executive Business Advisor/Contracting Officer
Federal Student Aid – Acquisitions Directorate
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(202) 377-3978 – Desk
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From: [Jackson-Harris, Tricia](#)
To: ["grp.MOHELANextGenTeam"](#); ["grp.FC-Contracting"](#)
Cc: [Lowe, Eddie](#); [Hawkins Panyard, Gabrielle](#); [Patillo, Aquita](#); [Booker, Anthony](#); [Samuels, Shaun](#); [Lohrenz, Mark](#); [Lewis, Crystal](#); [Folley, Victoria](#); [Johnson, Regena](#); [Harris Jones, Christina](#); [Cruz, Bruce J](#); [Odom, Christian](#)
Subject: Modification P00010_91003123F0314 | Stop Work Order - SDR | BPO-MOH
Attachments: [91003123F0314 P00010_SF30_09052024_Signed.pdf](#)

Good evening,

The purpose of the attached modification is to issue a Stop Work Order in accordance with BPO IDIQ Contract clause 52.242-15 Stop Work Order (AUG 1989) for Change Request (CR) 7109 – BPO Support of Student Debt Relief (SDR). All FSA staff and vendors have been directed to cease work related to SDR effective immediately. Please see the modification for details. Further guidance regarding FSA’s course of action will be provided as we receive updates.

Contractor confirmation of receipt and acknowledgement by email is requested.

Sincerely,

Tricia Jackson-Harris
Executive Business Advisor/Contracting Officer
Federal Student Aid – Acquisitions Directorate
U.S. Department of Education
(202) 377-3978 – Desk
(202) 744-4979 – Cell
Tricia.Jackson-Harris@ed.gov

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From: [Jackson-Harris, Tricia](#)
To: ["FHCNextGenBPOLeadershipTeam"](#)
Cc: [Lowe, Eddie](#); [Hawkins Panyard, Gabrielle](#); [Patillo, Aquita](#); [Booker, Anthony](#); [Samuels, Shaun](#); [Lohrenz, Mark](#); [Lewis, Crystal](#); [Folley, Victoria](#); [Johnson, Regena](#); [Harris Jones, Christina](#); [Cruz, Bruce J](#); [Odom, Christian](#)
Subject: Modification P00011_91003123F0311 | Stop Work Order - SDR | BPO-FHC
Attachments: [91003123F0311 P00011_SF30_09052024_Signed.pdf](#)

Good evening,

The purpose of the attached modification is to issue a Stop Work Order in accordance with BPO IDIQ Contract clause 52.242-15 Stop Work Order (AUG 1989) for Change Request (CR) 7109 – BPO Support of Student Debt Relief (SDR). All FSA staff and vendors have been directed to cease work related to SDR effective immediately. Please see the modification for details. Further guidance regarding FSA’s course of action will be provided as we receive updates.

Contractor confirmation of receipt and acknowledgement by email is requested.

Sincerely,

Tricia Jackson-Harris
Executive Business Advisor/Contracting Officer
Federal Student Aid – Acquisitions Directorate
U.S. Department of Education
(202) 377-3978 – Desk
(202) 744-4979 – Cell
Tricia.Jackson-Harris@ed.gov

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From: [Mcclam, Jackson](#)
Cc: [Lene, Christina](#); [Brillant, Nannie](#); [FSA ACQ Loan Servicing Team](#); [USDSCORTEAM](#); [Piccolo, Marc](#); [Cox, Brenda](#); [Porter, Katherine](#)
Subject: USDS - All Servicers - Stop Work Order CR 7037 SDR - USDS Student Debt Relief Discharge Processing
Date: Thursday, September 5, 2024 5:29:12 PM
Importance: High

Good afternoon USDS Servicers,

This email serves as official notification of a Stop Work Order in accordance with contract clause 52.242-15 Stop Work Order (AUG 1989) for the CR 7037 SDR - USDS Student Debt Relief Discharge Processing.

The work to be stopped is as follows: **ALL activity related to CR 7037.**

Further guidance regarding FSAs course of action will be provided after the Stop Work Order period ends.

Contractor confirmation of receipt and acknowledgement by email is requested.

Best regards,

Jackson McClam
Executive Business Advisor / Contracting Officer
U.S. Department of Education
Federal Student Aid, Acquisitions
(202) 304-2149